Applicant: Satoshi Seo et al.

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REMARKS

Claims 1-32 are pending in this application, with claims 1-22, 27 and 30 being independent. Claims 1, 2, 4-13 and 15-22 have been withdrawn from consideration, leaving claims 3, 14 and 23-32 under consideration.

Claims 3 and 23 have been rejected as being anticipated by Janssen. Claim 3 has been amended to recite an electroluminescence element that includes a hole transporting layer interposed between a buffer layer and a light emitting layer, as recited in the application at page 16, line 13 to page 17, line 7. Applicant requests reconsideration and withdrawal of the rejection of claims 3 and 23 because Janssen does not describe or suggest a hole transporting layer interposed between a buffer layer and a light emitting layer. Instead, Janssen discloses an electron transfer reaction between tetracyanoquinodimethane derivatives and MEH-PPV, with the reaction being a "photoinduced electron reaction." (See Janssen at p. 8841, line 5 of section III.A.) Janssen nowhere describes or suggests using the tetracyanoquinodimethane and MEH-PPV as a buffer layer of an electroluminescence element that is separated from a light emitting layer by a hole transporting layer. Accordingly, for at least this reason, the rejection should be withdrawn.

Claim 3, 23 and 24 have been rejected as being anticipated by Zaidi. Applicant requests reconsideration and withdrawal of this rejection because Zaidi, like Janssen, does not describe or suggest a buffer layer that is separated from a light emitting layer by a hole transporting layer. Instead, Zaidi discloses a mixture of a emeraldine base polyaniline with tetracyanoquinodimethane (TCNQ) for use as a ferromagnet. Accordingly, for at least this reason, the rejection should be withdrawn.

Claims 3, 14 and 23-32 have been rejected as being unpatentable over Bernius in view of Kono. Applicant requests reconsideration and withdrawal of this rejection because one of ordinary skill in the art would have had no motivation to combine Bernius, which is directed to organic light emitting diodes on plastic substrates, with Kono, which is directed to the different technical field of an electrically conductive polymer composition for use, for example, as a solid electrolyte layer of a capacitor.

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Moreover, even if Bernius and Kono were combined, the resulting combination would not describe or suggest a buffer layer that is separated from a light emitting layer by a hole transporting layer, as recited in claim 3. In particular, neither Bernius nor Kono describes or suggest placing a hole transporting layer between a buffer layer and a light emitting layer.

Nor would the resulting combination describe a buffer layer that includes a polymer compound containing a conjugate on at least one of a main chain and a side chain, and a compound represented by the general formula [3], as recited in each of the independent claims. Bernius discloses the coating on the anode of the electroluminescence element, but does not disclose that the coating may comprise polyaniline doped with TCNQ. By contrast, Kono discloses an electrode that includes polyaniline doped with TCNQ, but does not describe or suggest using such a material as a coating on an electrode or as a buffer layer of an electroluminescence element. Accordingly, nothing in Bernius or Kono would have led a person of ordinary skill in the art to use the material described by Kono as a coating on an electrode or as a buffer layer of an electroluminescence element.

Accordingly, for at least these reasons, the rejection should be withdrawn.

Applicant submits that all claims are in condition for allowance.

No fees are believed to be due. Please apply any charges or credits to deposit account 06-1050.

Respectfully submitted,

Date: February 28, 2005

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